

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

BRENNAN M. GILMORE,

Plaintiff,

v.

ALEXANDER E. (ALEX) JONES, *et al.*,

Defendants .

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) No. 3:18-cv-00017-NKM-JCH
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MOTION FOR *PRO HAC VICE* ADMISSION OF CHANI CREE GATTO-BRADSHAW

I, Andrew Mendrala, hereby move pursuant to Local General Rule 6(d) for the *pro hac vice* admission of Chani Cree Gatto-Bradshaw to the bar of this Court to act as co-counsel for the plaintiff, Brennan M. Gilmore, in this action. In support of this motion, Plaintiff submits the attached Declaration of Chani Cree Gatto-Bradshaw, to show that Ms. Gatto-Bradshaw meets the requirement of Local General Rule 6(d).

Respectfully submitted,

/s Andrew Mendrala
Andrew Mendrala, Virginia Bar No. 82424
Cohen Milstein Sellers & Toll PLLC
1100 New York Avenue NW, Fifth Floor
Washington, D.C. 20005
Attorney for Plaintiff

Dated: June 4, 2021

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DECLARATION OF CHANI CREE GATTO-BRADSHAW

I, Chani Cree Gatto-Bradshaw, declare as follows:

1. I am an attorney with the law firm of O'Melveny & Myers LLP, counsel for Plaintiff in the above-captioned action. I submit this declaration in support of Andrew Mendrala's June 4, 2021 Motion pursuant to Local General Rule 6(d) for the *pro hac vice* admission of Chani Cree Gatto-Bradshaw to the bar of this Court.
2. My full name is Chani Cree Gatto-Bradshaw.
3. My office address and telephone number are as follows:

O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036
Telephone: (212) 326-2000
4. I am admitted to the Bar of the State of New York.
5. I am applying for *pro hac vice* admission to the Western District of Virginia only for the conduct of the above-captioned case.

I hereby declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Executed at Cresskill, New Jersey on this 3rd day of June, 2021.

Respectfully submitted,

/s Chani Cree Gatto-Bradshaw

Chani Cree Gatto-Bradshaw
O'Melveny & Myers LLP
Times Square Tower
7 Times Square
New York, NY 10036
Telephone: (212) 326-2000

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[PROPOSED] ORDER

Upon consideration of the Motion of Andrew Mendrala for *Pro Hac Vice* Admission of Chani Cree Gatto-Bradshaw, dated June 4, 2021, it is hereby

ORDERED that Chani Cree Gatto-Bradshaw be specifically admitted to appear and participate in the above-captioned matter as co-counsel to Mr. Mendrala, attorney of record for the plaintiff.

Dated: _____, 2021

United States District Judge

CERTIFICATE OF SERVICE

I hereby certify that on this 4th day of June, 2021, a copy of the foregoing Motion for *Pro Hac Vice* Admission of Chani Cree Gatto-Bradshaw was served on all parties via the Electronic Case Filing (ECF) system, and separately sent via electronic mail to Mr. Lee Stranahan, Mr. Derrick Wilburn, and Mr. Scott Creighton.

/s/ Andrew Mendrala